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May 26, 2022

## VIA ECF

Honorable Loretta A. Preska  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Petersen Energía Inversora, S.A.U. v. Argentine Republic*, No. 15-cv-02739 (“*Petersen*”)  
*Eton Park Capital Management, L.P. v. Argentine Republic*, No. 16-cv-8569 (“*Eton Park*”)

Dear Judge Preska:

Pursuant to Rule 2(H) of Your Honor’s Individual Practices and Paragraph 13 of the stipulation and order governing the production and exchange of confidential materials in these actions (*Petersen*, Dkt. 177; *Eton Park*, Dkt. 124) (the “Protective Order”), Plaintiffs Petersen Energía Inversora, S.A.U., Petersen Energía, S.A.U., Eton Park Capital Management, L.P., Eton Park Master Fund, Ltd., and Eton Park Fund, L.P. (collectively, “Plaintiffs”) respectfully move for an order granting leave to file under seal Plaintiffs’ Combined Opposition to Defendants’ Motions for Summary Judgment (the “Opposition”), Plaintiffs’ Responses to Argentina’s Local Rule 56.1 Statement of Material Facts As To Which There Is No Genuine Dispute in Support of Its Motion for Summary Judgment, Plaintiffs’ Responses to YPF’s Rule 56.1 Statement of Undisputed Material Facts in Support of Its Motion for Summary Judgment, and Exhibits 135, 137, 138, 139, 142, 144, and 145 to the Declaration of George W. Hicks, Jr., in Support of Plaintiffs’ Combined Opposition to Defendants’ Motions for Summary Judgment.

Plaintiffs’ Opposition and Responses to Rule 56.1 Statements contain descriptions of or quotations from portions of the following documents that have already been filed under seal as authorized by the Court on April 15, 2022 (*Petersen*, Dkt. Nos. 380, 381; *Eton Park*, Dkt. Nos. 310, 311):

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- Transcripts of the depositions of Plaintiffs' witnesses Armando Luis Betancor Alamo, Edward Misrahi, and Marcy Engel; and non-party witnesses Christopher Bogart, Matías Eskenazi Storey, and Sebastián Eskenazi; and
- Documents with Bates numbers GP00058005 and GP00058008 produced by a non-party, and document with Bates number EP\_000027714, produced by Plaintiff Eton Park.

In addition, Plaintiffs' Opposition and Responses to Rule 56.1 Statements contain descriptions of or quotations from portions of the following materials that Defendants designated confidential under the Protective Order:

- Transcripts of the depositions of Defendants' experts Julio Pablo Comadira, Judge Alejandro Uslenghi, Rafael Mariano Manóvil, and Aida Kemelmajer.

The following Exhibits to the Declaration of George W. Hicks, Jr., contain descriptions of or quotations from, or are themselves, materials designated confidential under the Protective Order:

Exhibit 135 contains excerpts from the transcript of the March 15, 2022 deposition of Rafael Mariano Manóvil, which was designated confidential under the Protective Order.

Exhibit 137 contains excerpts from the transcript of the February 8, 2022 deposition of Judge Alejandro Uslenghi and the corresponding errata sheet, which Defendant Republic of Argentina designated confidential under the Protective Order.

Exhibit 138 contains excerpts from the transcript of the March 10, 2022 deposition of Julio Pablo Comadira and the corresponding errata sheet, which Defendant YPF S.A. designated confidential under the Protective Order.

Exhibit 139 contains excerpts from the transcript of the March 3, 2022 deposition of Aída Kemelmajer and the corresponding errata sheet, which Defendant YPF S.A. designated confidential under the Protective Order.

Exhibit 142, Rebuttal Expert Report of Richard Blackett, dated Dec. 3, 2021, quotes deposition testimony that Defendant YPF S.A. designated confidential under the Protective Order. It also quotes and describes third-party-produced documents that the third parties designated confidential under the Protective Order.

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Exhibit 144, Expert Report of Ignacio Tirado, dated Dec. 3, 2021, quotes and describes third-party-produced documents that the third parties designated confidential under the Protective Order.

Exhibit 145, Reply Expert Report of Manuel Conthe, dated Jan. 14, 2022, describes a third-party-produced document that the third party designated confidential under the Protective Order.

Respectfully submitted,

/s/ Paul D. Clement  
Paul D. Clement

Cc: All counsel of record via ECF